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October 1, 2019

**VIA ECF**

Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-Civ-3377-LAP**  
**Opposition to Plaintiff's September 26, 2019 Request**

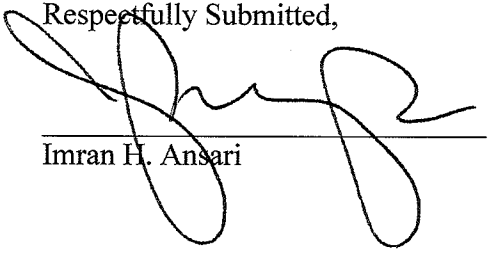
Dear Judge Preska,

In her letter of September 26, 2019, Plaintiff's counsel requests that the Court issue an Order directing Defendant to (a) provide the Plaintiff a "complete and unaltered copy" of the audio tape as transcribed in Defendant's filing under seal, and (b) provide the Plaintiff a "complete certified transcript of the entire recording...promptly."

Defendant objects to these requests in that they prematurely and improperly seek pre-answer discovery while dispositive motions are pending before the Court. If the Court so desires, Defendant will provide *the Court* these materials, under seal and for *in camera* review. Yet simultaneously providing Plaintiff unfettered access to this evidence, before issue is joined and discovery is commenced pursuant to F.R.C.P. Rule 26, creates a risk of substantial prejudice to the Defendant.

Should the Court be inclined to grant the Plaintiff's request, then in turn, Defendant respectfully requests that the Court permit Defendant to seek limited and expedited pre-answer discovery of his own. To wit, Defendant will seek (a) the unsealing of the transcript of Plaintiff's deposition testimony taken during the *Edwards & Cassell v. Dershowitz* action; (b) the unsealing of the emails of Sarah Ransome that are contained in the record of the *Giuffre v. Maxwell* action; and (c) the unsealing of the legal brief submitted by Sharon Churcher that is contained in the record of the *Giuffre v. Maxwell* action. To permit Plaintiff to benefit from pre-answer discovery at this time, while denying the Defendant the same privilege, is inequitable, and Defendant should be afforded the same right.

Respectfully Submitted,

  
Imran H. Ansari

CC: Counsel for Plaintiff (via ECF)